



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

December 3, 2019

Via ECF

The Honorable Paul A. Crotty
United States District Judge
Southern District of New York
United State Courthouse
500 Pearl Street, Courtroom 14C
New York, New York 10007

Re: *United States v. Joshua Adam Schulte*, S2 17 Cr. 548 (PAC)

Dear Judge Crotty:

We write in brief response to the defendant's December 3, 2019 letter, attached as Exhibit A, seeking yet another adjournment of a deadline in this matter, specifically, the defense's deadline to respond to the Government's motions *in limine*. Initially, the Government does not object to a brief adjournment of the defense's filing deadline but does not believe that an adjournment until two days after the final pretrial conference is appropriate. The original deadline for the filing of motions *in limine* was November 18, 2019. Prior to that deadline, defense counsel contacted the Government and requested a one-week extension of that deadline. The Government consented to that adjournment on the understanding that oppositions to motions *in limine* would remain due on December 6, 2019 given that the final pretrial conference was scheduled for less than two weeks later. Moreover, the defendant's complaints about the nature of the Government's motions *in limine* are meritless. Parties regularly file motions *in limine* that seek rulings as to the admissibility of categories of evidence, such as "evidence of narcotics-related corruption," *see, e.g., United States v. Hernandez*, No. 15 Cr. 379 (PKC) (S.D.N.Y. 2019); and respond to such motions promptly, *see, e.g., United States v. Flores*, No. 15 Cr. 765 (PAC) (S.D.N.Y. 2016) (motions *in limine* filed October 20, 2016; oppositions on October 26, 2016; final pretrial conference on November 2, 2016).

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By: _____/s/

David W. Denton, Jr.
Sidhardha Kamaraju
Matthew Laroche
Assistant United States Attorneys
Tel.: 212-637-2744 / 6523 / 2420

Cc: Defense Counsel (via ECF)